

ATTACHMENT

RICHARD ROUCO BIOGRAPHY

BIOGRAPHY OF RICHARD P. ROUCO

Richard P. Rouco is a partner of Quinn Connor Weaver Davies & Rouco, LLP (hereinafter “Quinn Connor”). The firm has eight lawyers with offices in Birmingham, AL and Decatur, GA. Quinn Connor represents labor unions and Taft Hartley funds in the Southeast. In addition to the firm’s labor and employment practice, the firm (primarily through Rouco’s practice) has actively litigated several class actions. Prior to forming Quinn Connor in April 2011, Mr. Rouco was a partner in Whatley, Drake & Kallas, where he practiced for approximately 17 years. He was born in Miami, Florida to parents who emigrated from Cuba in 1961. Mr. Rouco graduated *cum laude* from Florida State University in 1987 and then enrolled in University of California Irvine’s Philosophy Ph.d program. After four years as a graduate student in philosophy, Mr. Rouco decided that a career in the legal profession was a better fit and enrolled at the University of Alabama’s School of Law. He graduated *magna cum laude* from the University of Alabama’s School of Law in 1994. Mr. Rouco is a member of the Order of the Coif and was the senior articles editor on the editorial board of the Alabama Law Review.

The following are some of the class actions that Mr. Rouco has filed and/or actively participated in:

In Re Blue Cross Blue Shield Antitrust Litigation, MDL 2406, 2:13-cv-20000-RDP (N.D. Ala.); This is an antitrust case challenging anti-competitive practices and policies of BCBS companies. Mr. Rouco was appointed to the subscriber track written submissions committee. The case is currently pending before Judge Proctor in the Northern District of Alabama.

In Re American Express Antitrust Litigation and Marcus Corporation v. American Express, 1:13-cv-07355-NGG-RER (E.D.N.Y): This case is pending in the Southern District of New York before Judge Garaufis. The *Marcus* case challenged certain Amex’s network rules that limited competition. Rouco was actively involved in briefing summary judgment, class motions and discovery matters in the *Marcus v. American Express* and *In Re American Express Antitrust Litigation*.

In Re Puerto Rican Cabotage Antitrust Litigation, MDL 1960 (D. Puerto Rico, 2008) this was a price fixing antitrust class action transferred to the District of Puerto Rico. Mr. Rouco was part of the lead counsel team and was involved in drafting all the pleadings for class certification and the preliminary and final approval of the class settlement.

In Re Insurance Brokerage Antitrust/RICO Litigation, MDL 1663 (D. N.J): Mr. Rouco’s former firm was appointed lead counsel in this litigation. The case involved allegations of bid rigging, market allocation and mail fraud, among other things. He worked on all aspects of the case including deposing Defendants’ expert witnesses, briefing class certification and dispositive motions.

In Re Managed Care Litigation, MDL 1334 (S.D. Fla.) and *Love v. Blue Cross and Blue Shield Association*, No. 03-cv-21296 (S.D. Fla.) : Mr. Rouco's former firm was appointed lead counsel in a two related RICO class actions against Wellpoint, Humana, Cigna and the Blue Cross Blue Shield companies. The complaints alleged that these insurance companies agreed to the design and use of coding software that systematically altered provider billings to reduce the amount of reimbursement. In both cases, Mr. Rouco participated in the class action briefing and deposition of numerous witnesses.

North Jackson Pharmacy v. Express Scripts, 2006 WL 6625864 (N.D. Ala. 2006) Mr. Rouco's former firm was appointed lead counsel in an antitrust case filed against pharmacy benefit managers. Rouco prepared and argued the class certification motion before Judge Hopkins in the Northern District of Alabama.

Parsons v. Brighthouse Networks, 2015 WL 13629647 (N.D. Ala.) Mr. Rouco's current firm was part of the leadership in this antitrust class action alleging unlawful policies tying set top box rental to video programming services. The case was filed in the Northern District of Alabama and settled in 2015. Rouco helped draft and argue the class certification motion and worked with expert witnesses to develop the theory of the case. Mr. Rouco helped negotiate the class settlement and drafted the preliminary and final approval motions.

Jarrett v. Insight Communications, 2014 WL 3735193 (W.D. Ky) Mr. Rouco's current firm was part of the leadership team in an antitrust class action alleging unlawful policies tying set top box rental to video programming services. The case was filed in the Western District of Kentucky. Rouco briefed and argument summary judgment motions and directed the discovery during this litigation.

In Re TJX Companies Retail Security Breach Litigation, 524 F. Supp. 2d 83 (D. Mass. 2007) Mr. Rouco's former firm was co-lead counsel for a putative class of financial institutions in the security breach litigation. Rouco was part of the litigation team and drafted pleadings related to pre-trial motions.

McPhail v. First Command Financial Planning Services, 247 F.R.D. 598 (S.D. Cal. 2007) Mr. Rouco's former firm was class counsel in a class action alleging securities fraud against First Command. Rouco drafted class certification briefing that resulted in a certified class. He also deposed many of the key witnesses in the case.

Delagarza v. Tesoro Refining and Marketing, 2010 WL 3490231 (N.D. Cal. 2010), *Gardner v. Shell Oil*, 2010 WL 1576457 (N.D. Cal. 2010); *Burgess v. Tesoro Refining and Marketing*, 2011 WL 13217363 (C.D. Cal) and *USW v. ConocoPhillips*, 2009 WL 1610074 (C.D. Cal. 2009): Mr. Rouco was co-class counsel in four wage and hour class actions involving California wage and hour laws. He successfully argued all three motions for class certification and approval of the class actions settlements.

Rodgers v. Averitt Express, Inc. 2008 WL 5120900 (N.D. Ala. 2008): Mr. Rouco was class counsel in a wage and hour case involving motor carriers. He successfully briefed and argued class certification and then final approval of a settlement.

Fenwick v. The Advest Inc., 2009 WL 5184405 (D. Conn. 2009): Mr. Rouco was co-class counsel in an ERISA class action involving benefits under a non-qualified employee pension plan. Rouco briefed summary judgment and class certification motions. Mr. Rouco also briefed both the preliminary and final class settlement motions.

Ryan v. Flowserve Corp. 245 F.R.D. 560 (N.D. Tex. 2007): This was a securities fraud class action. Mr. Rouco assisted in briefing class and summary judgment motions. He also deposed several corporate representatives.

Hildenbrand v. W. Holding, 2011 WL 2312486 (D. Puerto Rico): This was a securities fraud class action. Mr. Rouco assisted in the briefing of pre-trial motions and deposing of Company witnesses.

In Re Countrywide Financial Corp. Mortgage Marketing and Sales Practices Litigation, 2011 WL 4809881 (S.D. Cal.): This was a RICO class action challenging Countrywide's marketing and sales practices. Mr. Rouco participated in the drafting of pre-trial motions (including class certification) and deposed several key witnesses during the litigation.

Lowe v. Singing River Health Systems, et. al. 15-cv-0044 (S.D. Miss.), *Lowe v. KPMG et. al.*, 17-cv-00319 (S.D. Miss) and *Jones et. al. v. Singing River Health Systems*, 14-cv-00447 (S.D. Miss.): These consolidated cases asserted class claims against the Defendants for, among other things, breaching and/or aiding in the breach of fiduciary duties owed to over 2000 plan participants regarding a defined benefit plan. Judge Guirola recently approved a Rule 23(b)(2) class requiring the employer hospital system to contribute approximately \$150 million dollars to the defined benefit plan over several years. Mr. Rouco represents a plan participant in this litigation and assisted in briefing oppositions to motions to compel arbitration and in support of class certification.